

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CRYSTALLEX INTERNATIONAL CORP.,)	
)	
<i>Plaintiff,</i>)	
)	No. 1:17-mc-00151-LPS
v.)	
)	
BOLIVARIAN REPUBLIC OF VENEZUELA,)	
)	
<i>Defendant.</i>)	

**PDV HOLDING, INC. AND CITGO PETROLEUM CORPORATION’S
MOTION FOR A LIMITED EXEMPTION FROM THE
STANDING ORDER REGARDING PERSONAL ELECTRONIC DEVICES**

PDV Holding, Inc. (“PDVH”), and CITGO Petroleum Corporation (“CITGO”) hereby move for an order to exempt certain persons from the District of Delaware’s May 17, 2024 Standing Order on Procedures Regarding the Possession and Use of Cameras and Personal Electronic Devices by Visitors to the J. Caleb Boggs Federal Building and United States Courthouse (the “May 17, 2024 Standing Order”). In support of this Motion, PDVH and CITGO state as follows:

1. The District of Delaware’s May 17, 2024 Standing Order provides procedures to regulate the possession and use of personal electronic devices by visitors to the J. Caleb Boggs Federal Building and United States Courthouse, which require, *inter alia*, for visitors to place personal electronic devices in a locked pouch. Paragraph 4 of the May 17, 2024 Standing Order provides for certain exemptions to the Standing Order.

2. A hearing is scheduled in this case for October 20 and 21, 2025.

3. The following attorneys, consultants, and law firm staff intend to appear at the hearing, request access to their electronic devices for purposes of participating and

communicating about the hearing, but do not have state-issued bar cards or otherwise meet the exemptions listed in Paragraph 4 of the May 17, 2024 Standing Order:

- Jack Lynch
- Fernando Vera
- Johnathan Hall
- Sam Figuera
- Erin Rogers
- Robyn Pierce
- Jonathan Lloyd

WHEREFORE, PDVH and CITGO respectfully request that the Court issue an order to exempt the above persons from the May 17, 2024 Standing Order.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

OF COUNSEL:

Nathan P. Eimer
Daniel D. Birk
Gregory M. Schweizer
Alec Solotorovsky
Hannah Bucher
EIMER STAHL LLP
224 South Michigan Avenue
Suite 1100
Chicago, IL 60604
(312) 660-7600
NEimer@eimerstahl.com
DBirk@eimerstahl.com
GSchweizer@eimerstahl.com
ASolotorovsky@eimerstahl.com
HBucher@eimerstahl.com

/s/ Phillip Reytan

Susan W. Waesco (#4476)
Alexandra M. Cumings (#6146)
Phillip Reytan (#7255)
1201 North Market Street
Wilmington, DE 19801
(302) 658-9200
SWaesco@morrisnichols.com
ACumings@morrisnichols.com
Preytan@morrisnichols.com

*Attorneys for PDV Holding, Inc. and
CITGO Petroleum Corporation*

IT IS SO ORDERED this ____ day of October, 2025.

The Honorable Leonard P. Stark
United States District Judge